

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Mingfei Zhu)	
)	
Plaintiff,)	Case No.: 24-cv-01139
v.)	
)	Judge: Hon. Virginia M. Kendall
The Partnerships and Unincorporated)	
Associations Identified in)	Magistrate: Hon. Beth W. Jantz
Schedule "A",)	
)	
Defendants.)	
)	

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff Mingfei Zhu files this Motion requesting leave to file the following documents under seal: (1) Schedule A to the Complaint, which lists the fully which lists the fully interactive, e-commerce stores operating under the seller aliases (the "Seller Aliases") and the ecommerce store urls; (2) Exhibit 2 and Exhibit 3 to the Complaint which illustrate a potential defendant in this case; (3) Exhibit 1 to the Declaration of Mingfei Zhu in support of the Motion for Temporary Restraining Order; and (4) Exhibit 2 to the Declaration of Kevin Keener in support of the Motion for Temporary Restraining Order, which includes screenshot printouts showing the e-commerce stores operating under the Seller Aliases and claim charts identifying the defendants in this case.

In this action, Plaintiff is requesting temporary *ex parte* relief for patent infringement, false designation of origin, and violation of the Illinois Uniform Deceptive Trade Practices Act. Due to the nature of the infringing activities, sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to service of process. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign

jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court's power to grant relief.

We know it is likely Defendants will impede justice because Defendants participate in or operate a website, sellerdefense.cn, that monitors this District's PACER filings and screens for Plaintiff counsel's filings. Without sealing these filings, Plaintiff will have his remedies thwarted.

Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents.

Dated: March 21, 2024

Respectfully submitted,

By: /s/ Kevin Keener
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